

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

HASSAN ABDELATIF,

Defendant.

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Case No. 4:17-CR0234

DEFENDANT HASSAN ABDELATIF'S MOTION TO CONTINUE TRIAL

COMES NOW Defendant, Hassan Abdelatif, by and through his attorney, James E. Carmichael, and for his Motion to Continue Trial states to this Honorable Court as follows:

1. This case is set for trial on Monday, April 11, 2022.
2. The parties are engaged in plea negotiations and have not yet reached an agreement.
3. Additionally, and alternatively, thousands of pages of documents and hours of video evidence were disclosed and, should this case go to trial, counsel needs additional time to review the documents and have further discussions with Defendant.
4. Further, the undersigned needs additional time to discuss with Defendant, the proposed plea agreement, the effects of signing a plea agreement, the burden of proof and all rights Defendant would be giving up.
5. Counsel has discussed the substance of this motion with Mr. Abdelatif and the relief requested herein.
6. Concurrently herewith Defendant Hassan Abdelatif files his signed Waiver of Speedy Trial.

7. Defendant through counsel, hereby respectfully requests a continuance of the trial setting in this case to May 23, 2022.

8. The undersigned discussed this motion with counsel for the Government, Mr. Mantovani, and he has no objection to this motion.

WHEREFORE, for the foregoing reasons, Defendant Hassan Abdelatif respectfully requests this Honorable Court to grant his Motion to Continue Trial and for such other and further relief as the Court deems just and proper.

NIEDNER, BODEUX, CARMICHAEL & HUFF, LLP

By: */s/ James E. Carmichael 2784*
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CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2022 the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

John Mantovani
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Attorneys for Plaintiff
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/s/James E. Carmichael